

In the  
**United States Court of Appeals**  
**for the Eleventh Circuit**

---

Sarah E. Thompson and Edward T. Metz,  
*Plaintiff - Appellants,*

v.

Brian P. Kemp, in his official capacity,  
acting as the Governor of the State of Georgia, et al.  
*Defendant - Appellees.*

---

**MOTION TO OPPOSE GOVERNOR KEMP’S AND SECRETARY  
RAFFENSPERGER’S SECOND REQUEST FOR EXTENSION OF TIME  
TO FILE APPELLEES’ BRIEF**

As notated in the docket, [State] “Appellees' brief is currently due on 01/21/2025. Over the phone 30-day extension granted by clerk as to Attorney Alexandra Noonan for Appellees Georgia Secretary of State and Governor of the State of Georgia. Appellees' brief is now due on 02/20/2025 as to Appellees Georgia Secretary of State and Governor of the State of Georgia. Any request for a second or subsequent extension of time shall be subject to 11th Cir. R. 31-2(d).”

11th Cir. R. 31-2(d) states, “A party’s second request for an extension will be granted only upon a showing of *extraordinary circumstances* that were not foreseeable at the time the first request was made.”

Appellants Sarah E. Thompson and Edward T. Metz find the Appellees’ rationale for their request involving “... press of professional and personal matters, including, among other things, multiple briefing deadlines the week of February 17, 2025” to be contradictory to a basic understanding of the Court’s intent of offering exceptions for “extraordinary circumstances” for the following undeniable reasons:

1. State Appellees delay addressing the fact that they have no evidence of the certifiable counting of votes in any jurisdiction of the State of Georgia per O.C.G.A. § 21-2-437(a) and (b) since the universal implementation of the current assistive electronic system in March 2020. (Appellants’ App. 2, Ex. N, O, P). This is an extraordinary, ongoing circumstance *denying representative government to Georgians*.
2. State Appellees de-prioritize the civil rights of Appellants and, by implication, over eight million registered Georgia voters. This is an extraordinary, ongoing circumstance *that deprives the rights of Georgians*.
3. State Appellees have known the due date for their brief since at least December 23rd, 2024, the timely filing date of Appellants’ Principal Brief.

This should have placed it as a high priority, but have chosen otherwise. This is an extraordinary, ongoing circumstance *evading responsibility*.

4. State Appellees' situation of being sued by innumerable other people and avoiding the state's interest, as stated above, are *not* extraordinary circumstances warranting a special privilege

Notably, Appellants, who are non-attorneys, pro se, have had no problem making court deadlines. State Appellees, as part of the Department of Law for an entire state, consisting of over 300 individuals, should have no problem meeting their deadlines with their extraordinary public resources. Whether specifically required by 11th Cir. R. 26-1 or not, Appellants Sarah E. Thompson and Edward T. Metz were not consulted prior to either the first or the second request for an extension by the Appellees' counsel. Appellees have had ample opportunity to adjust their schedules.

Finally, Appellants question the true motivation for this second request and lean towards the belief that it was made to stretch their deadline to the end of the current 2025-2026 legislative session. State officials have requested line item allocation of over \$50 million in the state budget to fund "upgrades" to its electronic "election" system. The system produces electronic data that Appellees have coerced poll officers to submit in place of lawful and duly certifiable vote counts and results, as mandated by O.C.G.A. § 21-2-437(a) and (b). They do so to

bring elections “in accordance with the Local Authorities Election Act,” which is foreign national law. (Appellants’ Appendix 2, Exhibits F.2, H.1, H.2, and I).

This is a matter involving subversion of government. The court should note that Judge Mark H. Cohen, whose Order of November 1, 2024 is the subject of this appeal, was assigned away from this case in the lower court on January 6, 2024. The presumption was that this was an involuntary move because he submitted no letter of recusal. The clerk noted the case reassignment on the docket after he refused to comport with the Plaintiffs’ Motion to Recuse and then placed another order on January 3, 2024 in favor of the government parties. At this point, an order of the 11th Circuit granting the request of State Appellees may be construed as being made with a bias towards the government.

Each day that passes without federal judicial review or criminal indictments of responsible officials further erodes any possibility of the U.S. Constitution being upheld within Georgia jurisdictions. As such, we respectfully request that the second extension of State Appellees be immediately DENIED.

Respectfully submitted this 12th Day of February, 2025,

/s/ Sarah E. Thompson  
Sarah E. Thompson, Pro se  
150 Timber Cove  
Statesboro, GA 30461  
(856) 866-6881  
freedomwinsusa@protonmail.com

/s/ Edward T. Metz  
Edward T. Metz, Pro se  
6231 Dodgen Rd. SW  
Mableton, GA 30126  
(404) 831-9288  
tedmetz@gmail.com

## CERTIFICATE OF COMPLIANCE

---

This document complies with:

1. Type-volume limitation of Rule 27(d)(2) of the Federal Rules of Appellate Procedure because it contains 714 words as counted by the word-processing system used to prepare the document.
2. Typeface and Type-Style This document complies with the typeface requirements of FRAP 32(a)(5) and the type-style requirements of FRAP 32(a)(6).

**/s/ Sarah E. Thompson**

Sarah E. Thompson, Pro se  
150 Timber Cove  
Statesboro, GA 30461  
(856) 866-6881  
freedomwinsusa@protonmail.com

**/s/ Edward T. Metz**

Edward T. Metz, Pro se  
6231 Dodgen Rd. SW  
Mableton, GA 30126  
(404) 831-9288  
tedmetz@gmail.com

## **CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT**

---

(1) The undersigned, Sarah E. Thompson and Edward T. Metz, Pro Se Co-Plaintiffs, certify to the best of our knowledge that the following is a full and complete list of all parties, including proposed intervenors, that have ever been named in the case, whether or not the party remains in the case:

Jim Benton, Defendant-Appellee

Steven F. Bruning, Defendant-Appellee

William Daughtry, Defendant-Appellee

Stacy Efrats, Defendant-Appellee

Tate Fall, Defendant-Appellee

Debbie Fisher, Defendant-Appellee

Theresa Jackson, Defendant-Appellee

Shontay Jones, Defendant-Appellee

Gov. Brian Kemp, Defendant-Appellee

Jennifer Mosbacher, Defendant-Appellee

SoS Brad Raffensperger, Defendant-Appellee

Tori Silas, Defendant-Appellee

(2) A complete list of other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of the case.

GoReclaimGA, LLC

(3) A complete list of each person serving as an attorney in the case. (Note: This is an estimate. No opposing attorney has filed into this case as of yet.)

Charles P. Aaron, Counsel for Bulloch County Board of Elections

Jeff Akins, Counsel for Bulloch County

Christopher Carr, Attorney General for State of Georgia

Julie Fisher, Counsel for the Ga Sec of State

Kristyn Long, Executive Counsel for the Governor

Charlene McGowan, General Counsel for Ga Sec of State

Alexandra M. Noonan, Assistant Attorney General, Counsel for Defendant/Appellees

George H. Rountree, Counsel for Bulloch County Board of Elections

H. William Rowling, Jr., Counsel for Cobb County

Bryan K. Webb, Deputy Attorney General, Counsel for Defendant-Appellees

Daniel W. White, Counsel for Cobb County BOER

Elizabeth T. Young, Senior Assistant Attorney General, Counsel for Defendant-Appellees

All named citizens are of the State of Georgia, USA.

This 12th Day of February, 2025.

/s/ Sarah E. Thompson

Sarah E. Thompson, Pro se  
150 Timber Cove  
Statesboro, GA 30461  
(856) 866-6881  
freedomwinsusa@protonmail.com

/s/ Edward T. Metz

Edward T. Metz, Pro se  
6231 Dodgen Rd. SW  
Mableton, GA 30126  
(404) 831-9288  
tedmetz@gmail.com



**U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**  
**CERTIFICATE OF SERVICE**

---

We hereby certify that I have this date served a copy of the within and foregoing pursuant to civil action No. 24-13689, MOTION TO OPPOSE GOVERNOR KEMP'S AND SECRETARY RAFFENSPERGER'S SECOND REQUEST FOR EXTENSION OF TIME TO FILE APPELLEES' BRIEF, electronically filing it with this Court's ECF system, which constitutes service on all attorneys who have appeared in this case and are registered to use the ECF system. We further certify that we served the foregoing document on the following non-CM/ECF participants by electronic mail and by depositing a true and correct copy of the document in the United States Mail, first class postage prepaid, addressed as follows:

Governor Brian Kemp Secretary Brad Raffensperger Attn: Elizabeth T. Young Georgia Department of Law 40 Capitol Square, SW Atlanta, GA 30334 eyoung@law.ga.gov	Brown Rountree PC Attorney for Bulloch Cnty Brd. of Elections 26 N. Main Street Statesboro, GA 30458 (912) 489-6900  Daniel W. White Attorney for Cobb Cny Brd. of Elec. & Reg. 222 Washington Ave Marietta, GA 30060 770-422-8900 dwhite@hlw-law.com
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

This 12th Day of February, 2025.

/s/ Sarah E. Thompson

Sarah E. Thompson, Pro se  
150 Timber Cove  
Statesboro, GA 30461  
(856) 866-6881  
freedomwinsusa@protonmail.com

/s/ Edward T. Metz

Edward T. Metz, Pro se  
6231 Dodgen Rd. SW  
Mableton, GA 30126  
(404) 831-9288  
tedmetz@gmail.com